

Exhibit 23

31 Group letter to Geoffrey Harrison
responding to notice of breach of
Confidentiality Agreement



Susman Godfrey L.L.P.
Attn: Geoffrey L. Harrison
1000 Louisiana St
Houston, TX 77002

Re: Arena Energy Letter

Dear Mr. Geoffrey Harrison

31 Group has worked diligently with Evercore and has been fully transparent throughout the entire process in an effort to obtain the highest bid possible for Arena's assets.

Arena requests:

- 1) 31 Group has destroyed all Derivatives that were contained in the VDR data room.
- 2) I do not understand this request since Arena is now in bankruptcy.

31 Group reserves all (and does not waive any) contractual, legal, and other rights against Arena and its Representatives, including but not limited to the right to seek money damages and all other available legal and equitable remedies, including reimbursement of attorneys' fees in connection with the matters discussed in this letter.

Sincerely,



Ken Goggans
31 Group LLC